



MISSOURI REPUBLICAN STATE COMMITTEE
RONALD REAGAN REPUBLICAN CENTER

October 5, 2006

BY FAX

General Counsel's Office
Federal Election Commission
Att: Ms. Rosemary C. Smith
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 5837

2006 OCT 10 A 10: 27

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: Complaint Against the Missouri State Democrat Committee

Pursuant to 11 C.F.R. § 111.4, the Missouri Republican Party submits this complaint against the Missouri State Democrat Committee ("Missouri Democrats"). It is our belief, based upon the information set out below, that the Missouri Democrats have violated FECA and the Commission's regulations with respect to three mail communications, attached hereto as Exhibits A, B and C. Specifically, it appears that the Missouri Democrats have either (1) violated 11 C.F.R. § 110.11(b)'s disclaimer requirements; and/or (2) are improperly attempting to fund these mailings under the "volunteer activity for party committees" exemption in 11 C.F.R. §§ 100.87, 100.147. Because the Missouri Democrats' violation comes at this late date, is wide-scale, and is on-going, we respectfully ask the Commission to undertake an expedited review of this matter. Absent such expedited review, there is no redress against the effects of the Missouri Democrats' illegal activity on our Party's political interests.

The mail communications at issue were paid for by the Missouri Democrats and constitute Federal Election Activity, as defined in 11 C.F.R. § 100.24(b). Exs. A, B and C. Two these mail pieces attack Republican Senator Jim Talent. One mail piece supports his Democrat challenger – Claire McCaskill. All three, and contain disclaimers stating only "Paid for by Missouri State Democratic State Committee." None of the mail pieces nor their disclaimers state whether or not any candidate or candidate's committee authorized the communication. Under the 11 C.F.R. §§ 110.11(b) such communications must state whether or not the communication was authorized by the candidate or candidate's committee. Further, the disclaimers do not include the "permanent street address, telephone number, or World Wide Web address" of the Missouri Democrats, as would be required if the pieces were not authorized by a candidate. 11 C.F.R.

P O Box 73, 204 East Dunklin / Jefferson City, MO 65102 / (573) 636-3146 / www.mogop.org
Paid for by the Missouri Republican State Committee - Richard C. Peerson, Treasurer
This communication is not authorized by any candidate or candidate committee.

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§ 110.11(b)(3). The Missouri Democrats' mail pieces fail to state either, and thus violate the disclaimer requirements.

Indeed Regarding the absence of the authorization statement, the only way that such a disclaimer would not violate section 110.11(b) information could be excluded is if the communication qualified as exempt party activity under section 100.147(d). To do so, the attached mail pieces would have to be "distributed by volunteers and not by commercial or for-profit operations." The attached mail pieces show no evidence of volunteer involvement. They were commercially produced, bear commercially printed labels, and have commercial postage stamps. See Exs. A, B and C. These mail pieces do not satisfy the volunteer requirement of 11 C.F.R. § 100.147.

Put simply, the Missouri Democrats have either violated the disclaimer requirements, and/or failed to allocate and report the costs of such materials to the McCaskill for Senate committee as either a contribution under 2 U.S.C. § 441a, or a party expenditure under 2 U.S.C. § 441a(d). As a result, it appears that the Missouri Democrats made an excessive contribution to the Claire McCaskill for Senate committee.

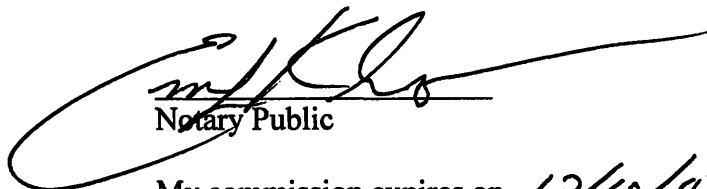
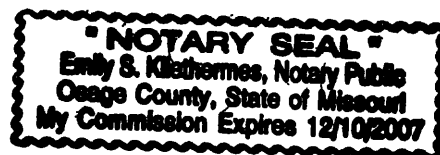
The above is true and correct to the best of my knowledge, information, and belief.

Sincerely,



Jared Craighead
on behalf of the Missouri
Republican State Committee

Subscribed and sworn to before me
on October 5, 2006.


Notary Public

My commission expires on 12/10/07.



That's what
Claire Moccaskill
is really made of.

Start with a Mom and Dad
who made sure she was brought up
right in rural Missouri.
Throw in a pinch
of lessons learned working her way through
school as a waitress.
And still in some
experience raising a family of her own.

Things About Claire You Might Not Know

Childhood Memory: My sister Anne and I working behind the counter at my great uncle Tom's drugstore in Lebanon, MO. He was also a deacon at our church and his store was a gathering spot for everyone in town.

First Job: Clerk in a fabric store. I love to sew and made many of my own clothes growing up.

Favorite Childhood Activity: Fishing with my Dad on Bull Shoals Lake, wrapping the fish we caught in foil and cooking them on the grill.

Greatest Personal Accomplishment: Raising my three children, who have become wise and confident young adults and make me proud every day.

Proudest Moment: Watching my three teenagers volunteer their time at a hospital for abandoned children on our medical mission trip to Guatemala.

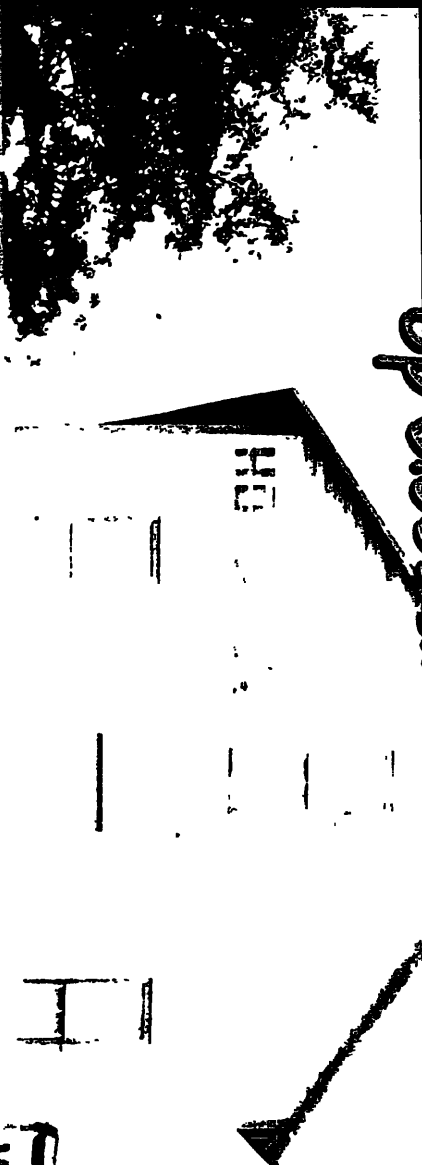
Favorite Movie: To Kill A Mockingbird.

Bet You Didn't Know: I'm a very knowledgeable sports fan.

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CLAIRE MCCASKILL Up Close and Personal



Claire McCaskill's father, William served in the military. Her mother, Mary, and returned to the community local feed mill in the little town of Harrison, Missouri.



Claire with husband Joseph.

Tough Prosecutor and No Nonsense State Auditor
She was elected Jackson County's first female prosecutor, helping bring down the crime rate by 45%, and then Missouri's toughest, most aggressive state auditor in history, while raising three kids as a single mom.

Family First

She still holds her family close today — after remarrying to make a blended family of nine, Claire also takes care of her mother, who still encourages her to keep fighting on the side of all Missouri families.

Born and raised in rural Missouri, Claire McCaskill learned the small town values that shaped her life from her parents, William and Betty Anne. Worked her way through college as a waitress. She didn't have a lot growing up, and she worked her way through college and law school as a waitress.

Missouri State Democratic Committee
P.O. Box 719
Jefferson City, Missouri 65102

ECRL0T-C-030

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JIM TALENT

EXXON



FACT: Exxon Oil gave more money to Jim Talent in his last Senate race than any other federal candidate in the country.

Information copied from such records for commercial purposes, other than

NAME OF COMMITTEE (in Full)

Exxon Mobil Corporation

Full Name (Last, First, Middle Initial)

Talent for Senate Comm

Mailing Address 147 N Melan

No wonder he's a favorite of the oil companies.

Jim Talent Voted To Give \$14 Billion In Tax Breaks To Big Oil

It's not surprising that Exxon gave more money to Jim Talent than any other federal candidate in the country in his last race. It should come as a shock that oil and gas companies have lavished nearly \$300,000 on Talent.

After all, he rewarded them well — with \$14 billion in tax breaks and subsidies at the very same time they are breaking records for their obscene profits.

Every Missourian — from farmers operating their machinery to seniors driving to the doctor, to young parents picking up their kids from school — we're all paying a steep price at the pump while oil companies made \$7.8 billion in profits last year at our expense.

Had enough of record oil profits and sky high gas prices?

Don't Vote For Talent.

THE FACTS:
JULY 29, 2005
Talent votes for \$9 billion in tax breaks and subsidies to Big Oil.
A 501(c)(3) organization.
Talent votes for \$5 billion in tax credits and write-offs for Big Oil.



Don't the big oil companies already have enough Senators on their side?



EXXON	
Self	319.10
Regular	319.10
Plus	331.10
Suprem	345.10

TERESA

MISSOURI TEACHER AND PARENT

"With gas prices so high,
had to start carpooling to
work with my mom."

"That means I'm not
home when my kids get off
the bus from school."



Gas prices are hurting real folks in Missouri. But Jim Talent
voted to give \$14 billion in tax breaks to oil companies.

That's just plain wrong.

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WHEN WE PAY
A LOT OF PUMP



JOHN DEERHED TO
GIVE US COMPANIES
\$14 BILLION IN TAX BREAKS

He makes us pay, not big oil.

**Jim Talent is Bought and Paid for by Big Oil and It's Costing US Plenty
Talent's Taken Nearly \$300,000 From Oil and Gas Companies**

Oil industry rides high energy prices to big profits

By Matt Krantz

the numbers promise to be dazzling. Earnings at the energy companies in the Standard & Poor's 1500 index are expected to jump 61% in the third quarter, dwarfing the 14.4% growth expected in the broad S&P 1500. S&P says

much of that is hurricane-related. Third-quarter earnings estimates for the energy sector are up 7.8% since July, but not all products of the oil business benefited equally.

Projected growth

Third-quarter earnings growth is expected to be huge for energy-related companies

Drilling

Energy

Integr

Employ

Big oil rakes in historic profits

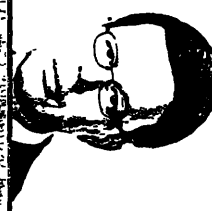
Refiners. Despite having to pay high prices for crude oil, refiners' earnings are expected to jump 141% because they can charge higher prices for the finished products, Guinness says. But, more important, they can refine more inexpensively than they could before because their plants are running at near 90% capacity, Guinness says. These plants should be running at

He makes us pay, not big oil.



H.R. 6
H.R. 4297

EXXON



VOTES FOR BIG OIL

In July, 2006, Talent voted to support the Energy Policy Act of 2005, which gave a \$10 billion tax break to the oil industry.

EXXON'S FAVORITE SENATOR

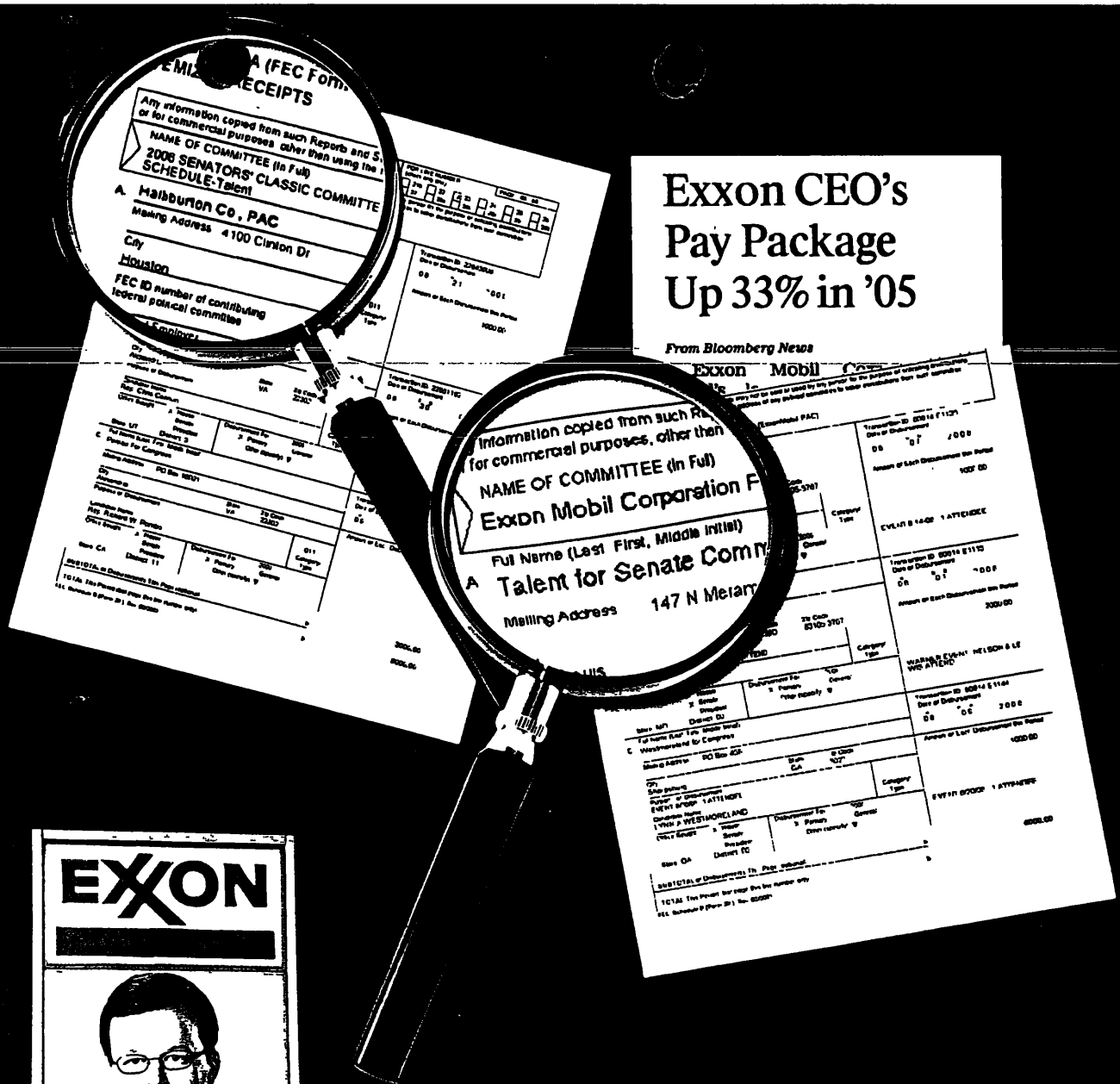
Exxon's favorite senator is Jim Talent. Talent has been a vocal supporter of the oil industry for years.

WE PAY AT THE PUMP

While the oil industry profits, we pay the price at the pump. The cost of gas has risen significantly in recent years.

Don't the big oil companies already have enough Senators on their side?

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Jim Talent took nearly \$300,000 from oil and gas companies and voted to give \$14 billion in tax breaks and subsidies to big oil, while they're making record profits

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